

November 30, 2006

Mr. Larry Bottolfson
Manager, Hydro Generation
Salt River Project
P.O. Box 52025
Phoenix, AZ 85072-2025

RE: Response to Comments on Tri-Cities Landfill Energy Facility, Draft Title V
Operating Permit, SR-ROP 05-03: Salt River Project's Comments

Dear Mr. Bottolfson:

This letter is in response to the Salt River Project's ("SRP") comment letter on the Draft Tri-Cities Landfill Energy Facility ("TCLEF") Title V Permit, dated October 4, 2006.

1. Permit Condition II.C.2 (Monitoring and Testing Requirements).

SRP suggested that the first sentence in this condition should reference Condition II.C.6 rather than II.C.1. The test methods specified are appropriate for the CO performance test rather than the portable CO analyzer monitoring.

RESPONSE:

The test method reference has been corrected to Condition II.C.6.

2. Permit Condition II.C.6 (Monitoring and Testing Requirements).

SRP requested clarification on TCLEF Draft Title V Permit language for required CO testing on ENG1, ENG2, ENG3 and TO1 in the second and fourth year of the permit term. In addition, SRP requested that CO and NMOC testing be waived in 2006.

RESPONSE:

In response to this comment, EPA has changed the performance test frequency language in the final permit to the following:

6. The permittee shall conduct performance tests for CO emissions from engines ENG1, ENG2, and ENG3 and from the thermal oxidizer, TO1. Tests on TO1 shall be conducted at the maximum operating capacity of ENG4 and ENG5. [40 C.F.R. § 71.6(b)]

- a. The permittee must test emission units ENG1, ENG2, ENG3 and T01 for CO emissions in the first, third and fifth years during the 5-year permit term. The first CO emissions source test must be performed not later than 12 months after this permit is effective. So long as compliance is demonstrated, source testing to measure CO emissions shall be conducted between 16 and 24 months thereafter during the third and fifth years of the permit term. If permittee fails any compliance demonstration for CO emission limits during any test required by this condition, the permittee shall test monthly from that point on until compliance is demonstrated. Once compliance is demonstrated, the permittee shall test not less than once every 12 months thereafter for the rest of the permit term.
- b. In addition to CO emissions testing in Condition II.C.6.a for ENG1, ENG2, ENG3 and T01, any emission unit that was shut down for one hour or longer as a result of a CO reading that exceeds 145 ppmv @ 15% O₂, shall also be tested during the next scheduled round of performance testing.

In regard to TCLEF's request not to be required to test for carbon monoxide (CO) or nonmethane organic compound (NMOC) in 2006, EPA agrees that this will not be necessary. As EPA intends to issue the renewed permit by the end of the year, the testing requirements of the expired permit in regard to CO testing will be supplanted by the testing requirements of the new permit, which requires source testing within 12 months of the effective date of the permit.

With respect to the NMOC testing, EPA has previously determined that in such cases where landfill gas is combusted for electricity generation by a separate stationary source, such as is the case here where the Tri-Cities Landfill gas is combusted at TCLEF, the landfill owners and/or operators are ultimately responsible for compliance with the requirements of Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills. Therefore, the Tri-Cities Landfill is responsible for Subpart WWW compliance, including the emission control requirements along with associated testing, monitoring, record-keeping, and reporting. As a result, applicable Subpart WWW requirements are now incorporated in the Tri-Cities Landfill Part 71 permit and have been deleted from the TCLEF permit, including the NMOC testing. EPA Region 9 issued the Tri-Cities Landfill permit on May 25, 2006. Therefore, any testing occurring at TCLEF is being done in conjunction with the requirements of the Tri-Cities Landfill Part 71 permit, and any changes to such testing must be done made with respect to that permit.

3. Permit Condition II.D.4 (Recordkeeping Requirements).

SRP suggested that this condition be revised to only require that records be maintained on the occurrence and duration of any malfunction.

RESPONSE:

In responding to this comment, EPA has changed the condition to read:

The permittee shall maintain records of the occurrence and duration of any malfunction in the operation of equipment under this permit.

If you have any questions, please contact Manny Aquitania at (415) 972-3977.

Sincerely,

Original signed by

Gerardo C. Rios
Chief, Permits Office

cc: Bobby Ramirez, SRPMIC
Ondrea Barber, SRPMIC
Barbara Sprungl, SRP
Dan Casiraro, SRP
Ted Hawley, SRP